

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Ryan Wetter

*Power of attorney for Thalia Sariotis and
Pro se respondent for defendants Thalia
Sariotis, Ryan Wetter, and Ellynn Wetter*

61 Redwood Drive Ocean, NJ 07712
ryanwetter@gmail.com
Tel: (857) 654-6744

In Re:

George Sariotis and Cindie Sariotis
Debtors; Plaintiffs

v.

Thalia Sariotis, Ryan Wetter, and
Ellynn Wetter
Defendants

Case No.: 22-12916-MBK

Adv. Pro. No.: 22-01109-MBK

Chapter: 11

Hearing Date: Thursday, June 23rd, 2022

Judge: Chief Judge Michael B. Kaplan

ADJOURNMENT REQUEST

1. I, Ryan Wetter,

- am the attorney for:
 am self-represented,

and request an adjournment of the following hearing for the reason set forth below.

Matter: Motion for Summary Judgment | Doc 3 | Filed & entered April 26th, 2022

Current hearing date and time: June 23rd, 2022 | 10:00 AM EST | MBK Courtroom 8, Trenton, NJ

New date requested: July 14th, 2022, although any amount of continuance at the discretion of Chief Judge Michael B. Michael B. Kaplan would be wholly appreciated.

Reason for adjournment request:

A. Difficulties in Retaining Representation: Since early April of 2022, I have consulted with many attorneys to represent Thalia Sariotis. A decent portion had conflicts, a decent portion felt unqualified, and most referrals led nowhere. I have a consultation this Tuesday, June 21st, with ...

(continues to next page)

1. Reason for adjournment request (continued)

an attorney who is reconsidering representation. List of past attorney consultations can be timely provided if the court deems it so.

B. Waiting for Materials From Debtors' Attorneys: After April 7th, 2022, I requested information from the debtors' attorneys and the debtors' real agency in relation to the sale of 61 Redwood Drive. Full delivery of materials has not been met, not allowing Thalia to be properly informed or actively participate in the sale of her home. We are still waiting. The outstanding materials we are awaiting can be named if the court deems it so.

C. Upcoming Record Delivery: I requested private records for Thalia and Gregory Sariotis, her deceased husband. These records should be in my possession on or before July 1st, 2022 and could prove vital in Thalia's defense against the motion for summary judgment. The records I am awaiting, along with their relevance, can be named if the court deems it so.

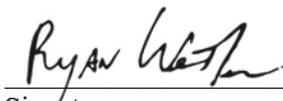
D. Continued Collection of Discovery: Gathering, understanding, and organizing materials to support a defense for Thalia Sariotis spans over 2 decades of debtor George Sariotis being both directly and indirectly involved in Thalia's financial life. The gathering is crucial and near complete, but secondary to obtaining legal counsel.

2. Consent to adjournment:

I have the consent of all parties. I do not have the consent of all parties (explain below):
This adjournment request is being emailed to the chambers of Judge Michael B. Kaplan and the debtors' attorneys simultaneously. Past April 19th, 2022, attempts to communicate with debtors' attorneys have gone unanswered, as have my few requests for private mediations. As of now, I do not have the consent of all parties, but will leave the boxes unchecked based on the response of the debtors or their attorneys.

I certify under penalty of perjury that the foregoing is true.

Date: June 20th, 2022


Signature

COURT USE ONLY:

The request for adjournment is:

- Granted New hearing date: 7/14/22 at 10:00am Peremptory
 Granted over objection(s) New hearing date: _____ Peremptory
 Denied

**IMPORTANT: If your request is granted, you must notify interested parties
who are not electronic filers of the new hearing date.**